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January 30, 2019

VIA Electronic Filing

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *BRG Harrison Lofts Urban Renewal LLC v. General Electric Company, et al.* (the "BRG Action") and *Evanston Insurance Company v. Accredited Environmental Technologies, Inc., et al.* (the "Evanston Action"),
Consolidated Action No. 2:16-cv-06577 (SRC-CLW)

Dear Judge Waldor:

We represent Plaintiff BRG Harrison Lofts Urban Renewal LLC ("BRG") in this consolidated matter. We and defendant General Electric ("GE"), write in accordance with your text order of October 26, 2018 requesting status reports regarding mediator selection and dates of mediation.

The parties have selected Robbie Barr, Esq. to mediate this matter, and we are working together to confirm the dates for mediation sessions with Judge Barr based on her availability and the availability of the parties and counsel. Based on current availability, we anticipate holding mediation sessions in the second or third week in April. In advance of those sessions we are working with Judge Barr to create a mediation plan that accounts for the complexity of the case and the number of parties involved, including dates for submission of position papers.

At this point, we do not anticipate requiring the Court's assistance to move the mediation forward.

Respectfully,

A handwritten signature in black ink, appearing to read "Dennis M. Toft".

DENNIS M. TOFT
Member

DMT:da

cc: All Counsel